



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Daniel A. Petalas
Associate General Counsel for Enforcement

BY: Mark Shonkwiler *MS*
Assistant General Counsel

Kimberly D. Hart
Attorney *KA*

SUBJECT: MUR 6922 (ACA/ACPAC)
Pre-Probable Cause Conciliation Agreement

On March 3, 2015, the Commission made reason to believe findings and voted to enter into a pre-probable cause conciliation agreement with ACA International ("ACA") and ACA International Political Action Committee and Rae Ann Bevington in her official capacity as treasurer ("ACPAC") relating to \$23,419 in prohibited corporate contributions that ACA made to ACPAC in the names of others and the resulting inaccurate disclosure reports that ACPAC filed with the Commission.

Attached is the negotiated conciliation agreement for ACA/ACPAC which would settle the Respondents' violations.

We recommend that the Commission accept the signed agreement.

II. RECOMMENDATIONS:

1. Accept the attached conciliation agreement with ACA International and ACA International Political Committee and Rae Ann Bevington in her official capacity as treasurer.
2. Approve the appropriate letter.
3. Close the file as to ACA International and ACA International Political Committee and Rae Ann Bevington in her official capacity as treasurer.